

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	
	)	
	)	
ZHENDI WANG,	)	Criminal No. 24-10034 (ADB)
	)	
	)	
Defendant	)	

**DEFENDANT WANG’S SENTENCE MEMORANDUM**

Zhendi Wang is a respected transplant surgeon from Wuhan, China. He has now served seventeen months in an American prison, thousands of miles from his wife, his young son, and the transplant patients who relied upon him for their survival. For the reasons set forth below, I respectfully urge the Court to accept the Rule 11(c)(1)(C) plea agreement in this case and to impose the agreed upon 20-month sentence.

After attending and excelling at university and then medical school in China, Zhendi Wang began his career as an attending physician in 2007. Soon thereafter, he accepted a three-year post-doctoral fellowship in Germany, where he trained and worked in the area of kidney transplants. After returning to China in 2012, his professional trajectory was meteoric. He was quickly promoted to assistant chief surgeon of transplant surgery at Wuhan Union hospital, which is associated with the Huazhong University of Science and Technology Tongji Medical College. In 2020, he was named chief surgeon, which means he is one of the senior surgeons at the hospital. Because Wuhan Union hospital is a teaching hospital, he is also a professor at the affiliated medical school.

Dr. Wang's talents and expertise in transplant surgery are widely known and respected, and extend outside the borders of his homeland. He has published in numerous medical journals and books, both in China and beyond. He is a member of the American Society of Transplantation (AST), and the European Society for Organ Transplantation (ESOT) and regularly attends and presents at medical conferences around the world. In short, Dr. Wang is an extraordinarily accomplished physician with impeccable credentials.

Dr. Wang is married to Quan Yuan, also a doctor. She is a plastic surgeon who specializes in scar tissue. The couple has an 11 year old son. As is tradition, Dr. Wang is responsible for the well-being of his parents, who are both retired. He bought an apartment for them near his own and he provides for all of their needs. The last 18 months have been truly devastating for Dr. Wang and his family, including his elderly parents. The Wang family arrived in San Francisco in July 2023 for a two-week California vacation, which was going to include national parks such as Yosemite and a visit to Disneyland. His wife and son last saw Dr. Wang shortly after their arrival, when Dr. Wang was arrested. He has been in custody ever since.

The circumstances of the offense are described in the PSR. Suffice it to say that Dr. Wang made a series of decision that, in retrospect, he deeply regrets. They have caused immeasurable and perhaps permanent damage to him, his family, and his career – and they inadvertently helped further an unlawful enterprise that caused harm to American communities. But I respectfully urge the Court to conclude that Dr. Wang has been punished enough, and that a fair and reasonable sentence of 20 months will allow him to return to his family and important profession in the near future. Such a term would be consistent with the aims of sentencing set forth at 18 U.S.C. § 3553(a), and be sufficient but not greater than necessary.

December 8, 2024

Respectfully submitted,

ZHENDI WANG

By his attorney,

/s/ Florian Miedel

Florian Miedel (*admitted pro hac vice*)

Miedel & Mysliwiec LLP

52 Duane Street, 7<sup>th</sup> Floor

New York, New York 10007

(212) 616-3042

fm@fmamlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2024, I served a copy of the foregoing on all registered parties by electronic filing on ECF.

/s/ Florian Miedel  
Florian Miedel